

# EXHIBIT 2

**From:** [Gonzalez, Arturo J.](#)  
**To:** [David Perlson](#)  
**Cc:** [QE-Waymo](#); [Jacobs, Michael A.](#); [UberWaymo](#)  
**Subject:** Sameer's Documents  
**Date:** Wednesday, March 22, 2017 2:55:44 PM

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David,

In addition to showing him the five documents he allegedly misappropriated, we would also like to show him his own transition memo, which I believe is the document you produced today (414-416). Please let us know today if we can show these documents to Sameer.

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-----Original Message-----

From: Gonzalez, Arturo J.  
Sent: Tuesday, March 21, 2017 10:24 PM  
To: David Perlson  
Cc: QE-Waymo; Jacobs, Michael A.; UberWaymo  
Subject: Sameer's Documents

David,

Apologies if we miscommunicated. Can we show him the 5 actual documents? If he allegedly took them, why shouldn't we be able to show him what he took?

Arturo

Sent from my iPad

> On Mar 21, 2017, at 8:11 PM, David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)> wrote:

>

> Wendy, in further follow up to your limited and specific inquiry yesterday only, you may show Sameer Kshirsagar the names of the five files identified in Mr. Willis' declaration at paragraph 7. Mr. Kshirsagar should treat and review these names in accordance with the terms of the Interim Protective Order.

>

> David

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>

> -----Original Message-----

> From: David Perlson

> Sent: Tuesday, March 21, 2017 4:46 PM

> To: Gonzalez, Arturo J. <[AGonzalez@mofo.com](mailto:AGonzalez@mofo.com)>; QE-Waymo <[qewaymo@quinnemanuel.com](mailto:qewaymo@quinnemanuel.com)>

> Cc: Jacobs, Michael A. <[MJacobs@mofo.com](mailto:MJacobs@mofo.com)>; UberWaymo <[UberWaymo@mofo.com](mailto:UberWaymo@mofo.com)>

> Subject: RE: 14,000 files

>

> Arturo, in response to your request, please find the list attached. It should be treated as Highly Confidential-Attorneys' Eyes Only under the Interim Protective Order. We will also produce the document with a document

identification number with our production of documents this week.

>

> David

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> -----Original Message-----

> From: Gonzalez, Arturo J. [<mailto:AGonzalez@mofo.com>]

> Sent: Saturday, March 18, 2017 7:04 PM

> To: QE-Waymo <qewaymo@quinnemanuel.com>

> Cc: Jacobs, Michael A. <MJacobs@mofo.com>

> Subject: 14,000 files

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> Quinn team,

>

> Please provide us with the names of the 14,000 files that were allegedly misappropriated. Thank you.

>

> Arturo

>

> Sent from my iPad

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> =====

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> This message may be confidential and privileged. Use or disclosure by anyone other than an intended addressee is prohibited. If you received this message in error, please delete it and advise the sender by reply email.

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